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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
JULIE JACOBY

07 Civ 4627 (LAK)(RLE)

Plaintiff,

NOTICE OF MOTION

-against-

HARTFORD LIFE AND ACCIDENT INSURANCE
COMPANY,

Defendant.
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PLEASE TAKE NOTICE that, upon the annexed affirmation of Scott M. Riemer, dated January 14, 2009, together with exhibits thereto, and upon all prior proceedings herein, plaintiff will move this Court before the Honorable Lewis A. Kaplan, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, Courtroom 12D, on the ___th of _____, 2009, at 9:30 a.m., or as soon thereafter as counsel can be heard, for an order:

- (a) enlarging the close of discovery from February 1, 2009 to April 17, 2009; and
- (b) Compelling defendant to produce within 5 days hereof: (i) the documents demanded in Plaintiff's Request for Production of Documents dated October 16, 2008; (ii) Second Set of Interrogatories by Plaintiff dated October 16, 2008; and (iii) Plaintiff's Third Request for Production of Documents, dated November 17, 2008; and

(c) Compelling defendant to obtain from UDC and MAG the documents and
information requested in the subpoenas served on December 24, 2008.

and for such other relief as the Court deems just and proper.

Dated: New York, New York
January 14, 2009

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By: /s/ Scott M. Riemer
Scott M. Riemer (SR5005)

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